

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-mj-04418-Sanchez

UNITED STATES OF AMERICA

v.

AKILA THARINDU APPUHAMY
KANAMPALLA KANKANMLAGE,

Defendant.

_____ /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No.
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No.
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

BY: /s/ Jacob Koffsky

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United States District Court

SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

AKILA THARINDU APPUHAMY
KANAMPALLA KANKANAMLAGE,

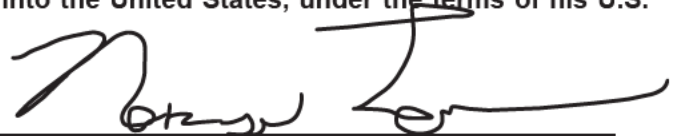
CASE NUMBER: 23-mj-04418-Sanchez

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about December 10, 2023, at the Miami International Airport, in Miami-Dade County, in the Southern District of Florida, the defendant, AKILA THARINDU APPUHAMY KANAMPALLA KANKANAMLAGE, did, in a matter within the jurisdiction of the executive branch of the United States, knowingly and willfully make a false statement as to a material fact to an Officer of U.S. Customs and Border Protection, in violation of Title 18, United States Code, Section 1001(a)(2).

I further state that I am an Enforcement Officer with U.S. Customs and Border Protection ("CBP"), and that this complaint is based on the following facts:

On or about December 10, 2023, the defendant, AKILA THARINDU APPUHAMY KANAMPALLA, arrived at Miami International Airport on Turkish Airlines Flight #157 from Istanbul. The defendant presented to Customs and Border Protection ("CBP"), for examination and entry into the United States, a Sri Lankan passport, a U.S. (C1/D) visa, and an employment letter from a Sri Lankan company called Manaco Marine Pvt Ltd. ("Manaco"). The employment letter purported to guarantee the defendant employment aboard one of Manaco's cargo ships: the M.V. MSC Stella. But the defendant was referred to secondary inspection for admissibility verification, and CBP Officers discovered that the employment letter presented by the defendant was fraudulent.

CBP Officers contacted Manaco, who indicated that it did not employ the defendant. Then, CBP administratively interviewed the defendant, who admitted, under oath: (1) that he had presented a fraudulent employment letter to CBP Officers to gain admission into the United States; (2) that he has never worked for Manaco; and (3) and that he knew that the employment letter was fraudulent because he had acquired a template of the letter from a friend. The defendant also admitted that he'd previously been admitted into the United States by presenting a real employment letter. The defendant would have been admitted into the United States, under the terms of his U.S. (C1/D) visa, if he had a valid employment letter, but he did not.



NARCISO FERNANDEZ, ENFORCEMENT OFFICER
U.S. CUSTOMS AND BORDER PROTECTION
(No. CAR08086)

Attested to by the Applicant in accordance with the
the requirements of Fed.R.Crim.P. 4.1 by WhatsApp.

December 11, 2023

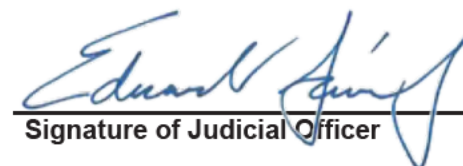
Date

at

Miami, Florida

City and State

EDUARDO I. SANCHEZ
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer


Signature of Judicial Officer